

2001-014-783



enguehard@ampresearch.com on 06/12/2001 06:06:13 PM

To: farcase.2001-014@gsa.gov
cc:

Subject: FAR Case 2001-014

June 12, 2001

General Services Administration
2001-014
FAR Secretariat (MVP)
Revocation)
1800 F Street, NW
Room 4035
ATTN: Laurie Duarte
Washington, DC 20405

FAR CASE
(Proposed

Dear Ms. Duarte:

We at AMP Research, Inc. are writing to comment on Federal Acquisition Regulation (FAR) case 2001-014 (Proposed Revocation) regarding contractor responsibility, labor relations costs and costs relating to legal and other proceedings.

We strongly endorse the proposed rule to revoke the rules that initially were issued on December 20, 2000. We believe that the standing rule incorporates standards that are too vague for addressing the issues which are complex. This rule ignores the fact that trained government employees would be needed to effectively watchdog such a rule.

We also believe the rule would:

- * Require contractor certifications seeding potential false claims suits;
- * Allow administrative amendments to public law bypassing legislative authority;
- * Allow for a "free for all" lawlessness with respect to violations and remedies;

thereby raising serious questions of due process.
We respectfully submit that you revoke the December 20, 2000 rule. The December 20, 2000 rule adds more problems rather than solving any.

Respectfully Yours,

Dr. Shirley Enguehard,
President & Sr. Research Phys.
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